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uncertainty involved in any contested litigation, I believe that it would be in the best interest to resolve this case based upon Defendant's settlement offer of One Million Six Hundred Seventy Five Thousand Dollars (\$1,675,000.00).

7. Resolving this case would avoid a significant commitment of additional time, as well as the expense of seeking to recover a judgment that would not appear to significantly exceed the amount of the current settlement offer, and it will bring closure to this matter for me.

8. It is my understanding that attorneys' fees to be charged in this case will be equal to a blended rate of 40% to all adult beneficiaries and 25% to all of the minor beneficiaries of the amount recovered, net of expenses, or \$586,250.00.

9. It is further my understanding that the following disbursements have been incurred by my attorney in connection with handling this case are as follows:

Costs

8/31/22	Filing Fees	\$ 402.00
8/31/22	Service	195.00
4/18/22	Estate set up fees and costs	<u>4,418.66</u>
	Total Costs	<u>\$ 5,015.66</u>

10. After payment of attorneys' fees and expenses the net settlement due to the estate is \$1,083,734.34.

WHEREFORE, it is respectfully requested that this Court grant an Order approving the proposed settlement in all respects, and providing for payment from the settlement proceeds of the expenses incurred by Levin & Zeiger LLP in connection with the prosecution of this action in the amount of \$5,015.66; providing for attorney's fees to Levin & Zeiger LLP in the amount of \$586,250.00; and directing the Estate Administrator to apply to the Court of Common Pleas of Erie County of the Commonwealth of Pennsylvania, for an Order of Distribution of the net proceeds of the

settlement pursuant to Title 20 of Pennsylvania's Decedents, Estates and Fiduciaries Law,
together with such other and further relief this Court deems just and proper.

Nicole M. Frye

Nicole Frye

Subscribed and sworn to before me
this 9TH day of May 2024.

Amanda St. John
Notary Public

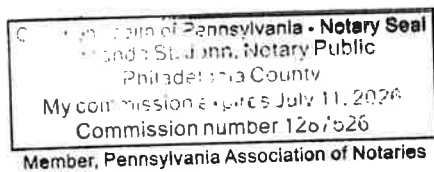


EXHIBIT A

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF ERIE

SHORT CERTIFICATE

I, AUBREA HAGERTY-HAYNES
Register for the Probate of Wills and Granting
Letters of Administration in and for
ERIE County, do hereby certify that on
the 27th day of May, Two Thousand and Twenty
-Two,
Letters of ADMINISTRATION
in common form were granted by the Register of
said County, on the

estate of HUBER JAMES M, late of NORTH EAST BORO
(Last, First, Middle)

a/k/a HUBER JAMES MATHEW

in said county, deceased, to FRYE NICOLE M
(Last, First, Middle)

and that same has not since been revoked.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the
seal of said office at ERIE, PENNSYLVANIA, this 1st day of June
Two Thousand and Twenty-Two.

File No. 25- 22- 00924

Date of Death 2/12/2022

S.S. # 081-68-7330


Register Of Wills